REMARKS

Claims 1 and 3-11 are pending. Claims 1, 3-5 and 7-11 have been amended. Claim 2 has

been canceled. No new matter has been introduced. Reexamination and reconsideration of the

present application is respectfully requested.

In the July 2, 2007 Office Action, the Examiner rejected claims 1 and 9 under 35 U.S.C.

§ 102(b) as being anticipated by Ohno, U.S. Patent No. 5,704,059 (hereinafter "Ohno"). The

Examiner rejected claims 1, 8 and 9 under 35 U.S.C. § 102(b) as being anticipated by Aoki et al.,

U.S. Patent No. 5,422,995 (hereinafter "Aoki"). The Examiner rejected claims 2-4, 10 and 11

under 35 U.S.C. § 103(a) as being unpatentable over Aoki in view of Okunishi et al., U.S. Patent

Application Publication No. 2002/0027676 (hereinafter "Okunishi") The Examiner rejected

claims 5-7 under 35 U.S.C. § 103(a) as being unpatentable over Aoki in view of Okunishi and

further in view of Elrod et al., U.S. Patent No. 5,303,200 (hereinafter "Elrod"). Applicant

respectfully traverses the rejections in view of the claims, as amended.

Independent claim 1, as amended recites:

A storage device comprising:
a plurality of memory blocks each including a plurality of cells in correspondence with a
data length; and
a first register for storing a first address representing a start point for storing a specific
number of first data each having a same value;
an adder for adding *run-length data representing the specific number of the first data*
each having the same value consecutively repeated to the first address so as to produce a second
address;
a second register for storing the second address; and
a controller for controlling a number of cells in the plurality of memory blocks to be
selectively and simultaneously placed in a write-enable state based on the first address and the
second address.

The Ohno reference does not disclose, teach, or suggest the storage device specified in

independent claim 1, as amended. Unlike the apparatus specified in claim 1, as amended, Ohno

does not teach a device which includes "an adder for adding *run-length data representing the*

specific number of the first data each having the same value consecutively repeated to the first

address so as to produce a second address."

Ohno is directed to a method of writing to a graphic memory wherein rectangular areas

for displaying windows are painted out in specified patterns. *(Ohno, Col. 1, lines 8-11)* Ohno

discloses a region selected in accordance with one row address and a plurality of column

addresses suited to the row address. The low-order six bits of a column address designate a top

address and a last address, which in turn designate the areas being subjected to a write operation.

Data are written into the area subjected to the write operation in segments, wherein each segment

is designated by the high-order two bits of the column address. However, Ohno fails to disclose,

teach, or suggest "an adder for adding *run-length data representing the specific number of the*

first data each having the same value consecutively repeated to the first address so as to

produce a second address."

In addition, Ohno does not disclose, teach, or suggest *"a controller for controlling a*

number of cells in the plurality of memory blocks to be selectively and simultaneously placed

in a write-enable state based on the first address and the second address." Accordingly,

Applicant respectfully submits that independent claim 1, as amended distinguishes over the

Ohno reference.

Aoki, alone or in combination with Ohno, does not disclose, teach, or suggest the storage

device specified in independent claim 1, as amended. Aoki is directed to compression and

expansion of bit coded information strings. *(Aoki, Col. 1, lines 8-11)* Aoki discloses a method

for increasing the speed of writing data into a bit map memory by way of decoding run-length

code. When the run-length code designates a run mode, a video controller operates in such a

way that a color designated by a second byte of the run-length code is repeatedly written into the

storage area of the bit map memory, the number of times corresponding to the number of pixels designated by a first byte of the run-length code. *(Aoki, Col. 3, lines 22-28)* However, neither Aoki nor the combination of Aoki and Ohno, discloses, teaches, or suggests "an adder for adding *run-length data representing the specific number of the first data each having the same value consecutively repeated* to the first address so as to produce a second address" or *"a controller for controlling a number of cells in the plurality of memory blocks to be selectively and simultaneously placed in a write-enable state based on the first address and the second address."* Accordingly, Applicant respectfully submits that independent claim 1, as amended distinguishes over the Aoki reference, alone or in combination with Ohno.

The Okunishi reference does not make up for the deficiencies of Aoki and Ohno. Okunishi discloses a process cartridge detachably attached to the main body of an image forming device (e.g., a printer). When data of high use frequency is stored in EEPROM 20 at an early-numbered address, CPU 27 of the printer makes access sequentially from the first address so as to read the data stored in the EEPROM 20 once without duplication until the second one of plural positions each storing the same content is accessed. However, the combination of Aoki and Okunishi fails to disclose, teach, or suggest "an adder for adding *run-length data representing the specific number of the first data each having the same value consecutively repeated* to the first address so as to produce a second address" and *"a controller for controlling a number of cells in the plurality of memory blocks to be selectively and simultaneously placed in a write-enable state based on the first address and the second address."* Accordingly, Applicant respectfully submits that independent claim 1, as amended distinguish over Aoki in combination with Ohno and Okunishi.

Independent claims 9 and 11 recite limitations similar to those in independent claim 1, as amended. Accordingly, Applicant respectfully submits that independent claims 9 and 11 distinguish over Aoki in combination with Ohno and Okunishi for reasons similar to those set forth above with respect to independent claim 1, as amended.

Claim 3-8 depend from independent claim 1, as amended. Claim 10 depends from independent claim 9, as amended. Accordingly, Applicant respectfully submits that claims 3-8 and 10 distinguish over Aoki in combination with Ohno and Okunishi for the same reasons set forth above with respect to independent claims 1 and 9, respectively.

With respect to claims 5-7, the Elrod reference does not make up for the deficiencies of the Aoki, Ohno, and Okunishi. Elrod is directed to a memory device having a plurality of ports for accessing the data stored therein. Elrod discloses that input of either pixel or bit slice data to both a lower memory block and an upper memory block in parallel "does not result in writing the same data to the two different memory blocks." *(Elrod, Col. 10, lines 12-18)* However, the combination of Aoki, Okunishi, and Elrod does not disclose, teach, or suggest "an adder for adding *run-length data representing the specific number of the first data each having the same value consecutively repeated* to the first address so as to produce a second address" and *"a controller for controlling a number of cells in the plurality of memory blocks to be selectively and simultaneously placed in a write-enable state based on the first address and the second address."* Accordingly, Applicant respectfully submits that claims 5-7 distinguish over the Aoki in combination with Ohno, Okunishi and Elrod.

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Applicant believes that the claims are in condition for allowance. If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at the Los Angeles, California telephone number (213) 488-7100 to discuss the steps necessary for placing the application in condition for allowance should the Examiner believe that such a telephone conference call would advance prosecution of the application.

Respectfully submitted,

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